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INC21.COM CORPORATION d/b/a  
GLOBALYP.NET

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

Inc21.com Corporation d/b/a  
GlobalYP.net,

Plaintiff,

vs.

Ma Sheila Flora, Tracy Gomez, Hubbub  
Inc., LKU Commtech Central, I2C-  
Intelligence to Communicate, Inc., Intelcon  
Call Center, Badoles, Inc., Pelatis BPO  
Solutions, Prolific Contract Central,  
Technocall Corp., Digicall Inc., Zynergy  
Solutions, and Contact Central Solutions,  
Inc.,

Defendants.

Case No. CV 08-02967 WHA

**PLAINTIFF'S REQUEST FOR ENTRY OF  
DEFAULT**

Plaintiff Inc21.com Corporation d/b/a GlobalYP.net ("Plaintiff" or "Inc21") respectfully  
requests entry of default against Defendants Ma Sheila Flora, Tracy Gomez, Hubbub Inc., LKU  
Commtech Central, I2C- Intelligence to Communicate, Inc., Intelcon Call Center, Badoles, Inc.,  
Pelatis BPO Solutions, Prolific Contract Central, Technocall Corp., Digicall Inc., Zynergy

DB2/20809801.1

Solutions, and Contact Central Solutions, Inc. (collectively "Defendants") in the above titled action. Inc21 is a California Corporation. Defendants are adult individuals and entities that reside in the Philippines.

Defendants are in default. Inc21 served Defendants by mail and publication. *See* Declaration of Joanna Sax in Support of Plaintiff's Request for Entry of Default ("Sax Dec.") ¶¶ 2, 3.

First, Inc21 served Defendants with the summons and complaint via registered mail pursuant to Federal Rule of Civil Procedure 4(f)(2)(C)(ii) on Wednesday July 16, 2008. *See id.* ¶ 2; **Exh. B** (proof of service). The summons provided thirty (30) days for the defendants to respond. *See id.* Service by mail adds an additional ten (10) days. This request for entry of default is filed more than 40 days after service by mail.

Second, Inc21 served Defendants by publication in a newspaper of general circulation in the Philippines. *See id.* ¶ 3; **Exh. C** (proof of service by publication). On July 27, 2008, the *Philippine Star* published the notice of the above captioned action. *See id.* The published notice provided thirty (30) days for the defendants to respond. *See id.* In compliance with Philippine law, a publisher's affidavit was executed and the notice of the publication was mailed to each named defendant in this action. *See id.*

No defendant has served or filed a timely response. *See id.* ¶ 1; **Exh. A** (On-line docket). The time allowed by law for responding has expired. Accordingly, Inc21 respectfully requests an entry of default.

Dated: August 29, 2008

MORGAN, LEWIS & BOCKIUS LLP

By: \_\_\_\_\_/s/  
Joanna Sax  
Attorneys for Plaintiff  
INC21.COM CORPORATION d/b/a  
GLOBALYP.NET